

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

BUREAU OF CONSUMER FINANCIAL  
PROTECTION,

Plaintiff,

v.

PROGREXION MARKETING, INC., et al.

Defendants.

Case No. 2:19-CV-00298-BSJ

**DEFENDANTS' UNOPPOSED MOTION  
FOR AN EXTENSION OF TIME TO FILE  
RESPONSES TO THE BUREAU'S  
EVIDENTIARY OBJECTIONS**

Defendants Progrexion Marketing, Inc.; PGX Holdings, Inc.; Progrexion Teleservices, Inc.; eFolks, LLC; CreditRepair.com, Inc.; John C. Heath, Attorney at Law, PLLC, d/b/a Lexington Law (“Defendants”) respectfully move for a one-week extension of the deadline to file responses to the Bureau’s evidentiary objections, Dkt. No. 559, until May 23, 2023; *see* DUCivR 7-1(b)(1)(B). Defendants’ proposed deadline of May 23, 2023, is more than a week before the Court is scheduled to hear the Bureau’s Motion for Relief and Judgment and the associated evidentiary objections for hearing on June 1, 2023. *See* Dkt. No. 563. Defendants conferred with the Bureau regarding this request, and the Bureau does not oppose the extension.

Under DUCivR 7-1(b)(1)(B), a party offering evidence to which there has been an objection ordinarily has seven days after the objection is filed to file a response. On May 9, 2023, the Bureau filed 15 pages of objections to six of the Defendants’ exhibits in support of their Response to Plaintiff’s Motion for Relief and Judgment, including multiple objections to each exhibit. *See* Dkt. No. 559. Per the Bureau, “[e]xceptional circumstances” justified filing the objections in a separate document, such that they did not count against the Bureau’s word limit for its Reply. *Id.* at 2. In light of the number and length of the Bureau’s objections, Defendants request a reasonable extension of one additional week to sufficiently respond.

A proposed order adjourning the deadline to file responses is attached hereto.

Dated: May 15, 2023

Respectfully submitted,

/s/ Edward J. Bennett

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2023, I caused a true and correct copy of the foregoing to be filed on the CM/ECF system, which will send notification of such filing to all parties and counsel in this case.

/s/ Emma J. Nino  
Emma J. Nino